

# **Exhibit 4**

Docket

*Freeman, et al., v. Hoft, et al.*

**Sort Date Entries: Descending Ascending**

**Display Options:** All Entries



**10/07/2024**

Notice of Settled Case Filed

Verified Joint Notice of Settlement and Motion to Vacate Trial Date and Stay Proceedings Pending Satisfaction of Settlement Agreement; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** JOSEPH HOFT

**09/17/2024**

Motion of Withdrawl of Counsel

Motion to Withdraw; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JOSEPH HOFT

**09/12/2024**

**Order**

ORDER FOR PRO HAC VICE OF NICHAEAL-ANGE DESRUISSEAU, NY Bar # 6093264 IS HEREBY GRANTED. SO ORDERED: JUDGE ELIZABETH B HOGAN, 48160.

**09/06/2024**

Entry of Appearance Filed

Entry of Appearance of Michel-Ange Desruisseaux; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Proposed Order Filed**

Proposed Order Granting Motion for Admission Pro Hac Vice; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

Motion Filed

Motion for Admission Pro Hac Vice of Michel-Ange Desruisseaux; Exhibit A - Receipt as Required by Rule 6.01b; Exhibit B - Certificate of Good Standing; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**09/05/2024**

**Notice to Take Deposition**

Amended Notice of Deposition of Joseph Hoft; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Notice to Take Deposition**

Amended Notice of Deposition of James Hoft; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Notice to Take Deposition**

Notice of Deposition of TGP Communications LLC; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**08/26/2024**

**Case Management Ordered**

First Amended Scheduling Order Granted. So Ordered: Elizabeth B. Hogan, Judge

Memorandum Filed

Defendants Supplemental Memorandum in Support of their Motion to Stay Proceedings Pending Appeal; Ex A - Notice of Appeal; Ex B - Designation re Record on Appeal and Statement of Issues; Ex C - Expedited Motion to Stay - Federal Court; Ex D - Notice of Hearing on Federal Court Expedited Motion to Stay; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

**08/23/2024**

Response Filed

Plaintiffs Opposition to Defendants Motion for a Stay; Exhibit 1, Dismissal of Bankruptcy; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

08/22/2024

Case 1:24-cv-00900-SDJ Document 9-5 Filed 10/15/24 Page 3 of 25 PageID #: 371

Defendants Objections to Special Masters Eighth Report; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

Response Filed

Defendants Response in Opposition to Plaintiffs Motion for an Amended Scheduling Order; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

08/21/2024

Notice of Hearing Filed

Notice of Hearing; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

Notice of Hearing Filed

Notice of Hearing on Motion to Stay Pending Appeal; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

08/19/2024

Notice of Hearing Filed

Notice of Hearing on Plaintiffs Motion for Amended Scheduling Order; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

Motion Filed

Plaintiffs Motion for Amended Scheduling Order with Respect to Discovery and Briefing Deadlines; Exhibit 1, Dismissal of Bankruptcy; Exhibit 2, August 9, 2024, Ampleman-Burns Email Thread; Exhibit 3, August 13, 2024, Ampleman-Burns Email Thread; Exhibit 4, Proposed Scheduling Order of Plaintiffs; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

08/15/2024

Objections Filed

Defendants Objections to Seventh Report of Special Master; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

08/14/2024

Motion of Withdrawal of Counsel

Motion for Withdrawal of Attorney Michael Morrell; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

08/07/2024

Report Filed

EIGHTH REPORT AND RECOMMENDATION OF SPECIAL MASTER; Electronic Filing Certificate of Service.

**Filed By:** PETER JOSEPH DUNNE

08/05/2024

Verification

Verification for Motion to Stay; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

Suggestions in Support

Defendants Suggestions in Support of Their Verified Motion to Stay Proceedings and to Continue Trial Setting; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

Motion to Stay

Defendants Verified Motion to Stay Proceedings and Continue Trial Setting; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

08/01/2024

**Bankruptcy Court Order Filed**

Case #24-13938 - Memorandum Opinion and Order Granting Motion to Dismiss Chapter 11 Case Under Sections 1112(b) AND 305(a) of the Bankruptcy Code and Cancelling Hearing

07/26/2024

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**04/25/2024**

Notc/Sugg of Bankruptcy Filed

Suggestions of Bankruptcy; Exhibit A; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

**04/24/2024**

**Notice to Take Deposition**

Notice of Deposition of Joseph Hoft; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Notice to Take Deposition**

Notice of Deposition of James Hoft; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**04/16/2024**

Filing of Briefs

Supplemental Brief of Plaintiffs in Support of 5th Motion to Compel Discovery; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**04/15/2024**

Report Filed

Seventh Report and Recommendation of Special Master; Electronic Filing Certificate of Service.

**Filed By:** PETER JOSEPH DUNNE

**Cause Taken Under Advisement**

Plaintiffs' Fifth Motion to Compel Discovery called, heard, and submitted. (see order) SO ORDERED: JUDGE JOSEPH P. WHYTE  
#38194

**Motion Hearing Held**

**Associated Entries: 04/02/2024 - Motion Hearing Scheduled**

**Scheduled For:** 04/15/2024; 9:00 AM; JOSEPH PATRICK WHYTE; City of St. Louis

**04/12/2024**

Certificate of Service

Certificate of Service of Discovery Responses and Objections and Second Set of Requests for Admission; Electronic Filing

Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**04/05/2024**

Response Filed

Defendants Supplemental Opposition to Plaintiffs 5th Motion to Compel and for Sanctions; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

**04/03/2024**

Cert Serv of Rspns to Interrog

Certificate of Service of Plaintiffs Responses and Objections to Interrogatories; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**04/02/2024**

**Motion Hearing Scheduled**

**Associated Entries: 04/15/2024 - Motion Hearing Held**

**Scheduled For:** 04/15/2024; 9:00 AM; JOSEPH PATRICK WHYTE; City of St. Louis

Notice of Hearing Filed

Notice of Hearing on Plaintiffs 5th Motion to Compel; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**04/01/2024**

03/20/2024

Response Filed

Defendants Response in Opposition to Plaintiffs Motion to Compel; Exhibit 1; Exhibit 2; Exhibit 3; Exhibit 4; Appendix A; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

03/15/2024

**Order**

The State of Missouri, United States of America, to the Appropriate Judicial Authority in the State of Georgia. WHEREAS, there is an action pending in this, the Circuit Court of the City of St.Louis, Missouri , entitled as above, and this Court has received information suggesting that complete adjudication of the action cannot be done without the testimony and/or records of the following persons and entities, which reside or may be found within jurisdiction and are reported t have knowledge enabling them to give pertinent and probative testimony: (SEE ORDER) SO ORDERED: JUDGE JOSEPH P. WHYTE #38194

03/11/2024

**Order**

The parties appear by counsel on Defendant's matter for leave to expand the number of depositions to twenty (20). The motion was called, heard and GRANTED. SO ORDERED: JUDGE JOSEPH P. WHYTE #38194

**Motion Hearing Held**

**Associated Entries: 02/27/2024 - Motion Hearing Scheduled**

**Scheduled For:** 03/11/2024; 9:00 AM; JOSEPH PATRICK WHYTE; City of St. Louis

03/07/2024

Response Filed

Plfs Opp. to Dfts Mtn for 41 Letters Rogatory and Limited Opp. to Dfts Motion for Leave to Take 20 Depositions; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

03/06/2024

Cert Serv of Req for Admission

Certificate of Service of Plaintiffs Requests for Admission; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Order Withdrawing Attorney:**

**Notice to Take Deposition**

Tenth Amended Notice to Take Deposition of Jordan Conradson; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

Motion Filed

Defendants Amended Motion for Letters Rogatory and to Appoint Persons to Take Depositions; Amended Proposed Order; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

03/05/2024

Memo of Law in Suppt of Filed

Suggestions in Support of Plaintiffs Fifth Motion to Compel Discovery and for Sanctions; Exhibit 1; Exhibit 2; Exhibit 3; Exhibit 4; Exhibit 5; Exhibit 6; Exhibit 7; Exhibit 8; Exhibit 9; Exhibit 10; Exhibit 11; Exhibit 12; Exhibit 13; Exhibit 14; Exhibit 15; Exhibit 16; Exhibit 17; Exhibit 18; Exhibit 19; Exhibit 20; Exhibit 21; Exhibit 22; Exhibit 23; Exhibit 24; Exhibit 25; Exhibit 26; Exhibit 27; Exhibit 28; Exhibit 29; Exhibit 30; Exhibit 31; Exhibit 32; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

Motion to Compel

Plaintiffs Fifth Motion to Compel Discovery and for Sanctions; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

03/04/2024

Motion for Leave  
Case 4:24-mj-00999-SDT Document 9-5 Filed 01/15/24 Page 6 of 25 PageID #: 874  
Defendants Motion for Leave to Take Additional Depositions; Exhibit A - Defendants Motion for Letters Rogatory and to Appoint Persons to Take Deposition; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

Notice of Hearing Filed

Defendants Notice of Hearing on their Motion for Leave to Take Additional Depositions; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

02/28/2024

**Case Management Ordered**

SCHEDULING ORDER GRANTED SO ORDERED: ELIZABETH B HOGAN

**Order**

THE COURT ENTERS ITS SCHEDULING ORDER WHICH IS CONSISTENT WITH AND INCORPERATED THAT 1. ALL DISCOVERY SHALL BE COMPLETED BY SEPTEMBER 10, 2024. 2. FACT DISCOVERY IS COMPLETED BY MAY 31, 2024. 3. DISCLOSURE AND DEPOSITIONS OF EXPERTS , REBUTTAL EXPERTS BE COMPLETED AS IN INCORPERATED IN ATTACHED ORDER SO ORDERED: JUDGE ELIZABETH B HOGAN

**Motion Granted/Sustained**

DEFENDANTS MOTION WAS GRANTED SO ORDERED: ELIZABETH B HOGAN

**Order**

CAUSE CALLED ON DEFENDANT'S MOTION -HEARD ON THE RECORD BY SHELLY TALLERICO # HEARD AND SUBMITTED SO ORDERED: ELIZABETH B HOGAN

Motion Filed

Motion for Letters Rogatory and for the Appointment of Person to Take Deposition; Proposed Order - Letters Rogatory; Proposed Order - Commission for Taking of Deposition; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

02/27/2024

**Motion Hearing Scheduled**

**Associated Entries: 03/11/2024 - Motion Hearing Held**

**Scheduled For:** 03/11/2024; 9:00 AM; JOSEPH PATRICK WHYTE; City of St. Louis

02/26/2024

Notice of Hearing Filed

Notice of Hearing on Defendants Motion for Letters Rogatory and for a Commission to Take Deposition; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

Report Filed

Fourth Report and Recommendation of Special Master; Ex. A Plaintiffs Proposed Scheduling Order; Ex. B Defendants Proposed Scheduling Order; Electronic Filing Certificate of Service.

**Filed By:** PETER JOSEPH DUNNE

02/21/2024

Notice of Hearing Filed

Defendants Amended Notice of Hearing; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

Motion Filed

Defendants Amended Motion to Enter Scheduling Order; Exhibit A - Courts Order of January 17 2024; Exhibit B - Defendants Amended Proposed Scheduling Order; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

02/20/2024

Motion Filed

Motion for Withdrawal of Attorney Eliza Simons; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Notice to Take Deposition**

Eight Amended Notice of Videotaped Deposition of Jordan Conradson; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

02/16/2024

Notice of Hearing Filed

Notice of Hearing of Defendants Motion to Enter Scheduling Order; Electronic Filing Certificate of Service

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

Notice of Hearing Filed

Notice of Hearing on Motion for Plaintiffs Proposed Scheduling Order; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Proposed Order Filed**

Plaintiffs Proposed Scheduling Order; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

Motion Filed

Plaintiffs Motion for a Scheduling Order and Suggestions in Support; Exhibit 1; Exhibit 2; Exhibit 3; Exhibit 4; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

Motion Filed

Defendants Motion to Enter Scheduling Order; Exhibit A - Courts Order of January 17 2024; Exhibit B - Defendants Proposed Scheduling Order; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

**02/15/2024**

**Notice to Take Deposition**

Notice of Videotaped Deposition of Pamela Michelle Branton; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**02/12/2024**

**Notice to Take Deposition**

7th Amended Notice of Deposition of Jordan Conradson; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**01/30/2024**

Certificate of Service

Certificate of Service of Plaintiffs Requests for Production; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**01/24/2024**

**Order**

ORDER GRANTING MOTION FOR PRO HAC VICE OF WILLIAM C BUNDREN TX BAR NUMBER 03343200 SO ORDERED:  
JUDGE ELIZABETH B HOGAN

**01/22/2024**

**Notice to Take Deposition**

Notice of Deposition of Kevin Moncla; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**01/17/2024**

**Jury Trial Scheduled**

**Scheduled For:** 03/10/2025; 8:00 AM; ELIZABETH BYRNE HOGAN; City of St. Louis

**Order**

Parties shall submitted a scheduling order with in 30 days of this date. So Ordered: Elizabeth B. Hogan, Judge

**Order for Continuance**

Motion for continuance was called, heard and granted. over the objection of the other side. So Ordered: Elizabeth B. Hogan,  
Judge

**Hearing/Trial Cancelled**

**Associated Entries: 01/11/2024 - Jury Trial Scheduled**

**Scheduled For:** 03/04/2024; 9:30 AM; REX M BURLISON; City of St. Louis

**Judge Assigned**

**01/16/2024**



**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

Response Filed

Defendants Response to Plaintiffs Motion for Trial Setting; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

01/15/2024

**Proposed Order Filed**

Proposed Order in re Motion for Admission Pro Hac Vice of William Charles Bundren; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

Motion Filed

Motion for Admission Pro Hac Vice of William Charles Bundren; Exhibit 1 - Certificate of Good Standing; Exhibit 2 - Supreme Court PHV Receipt; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

Notice of Hearing Filed

Notice of Hearing; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

01/12/2024

Motion to Modify

Verified Motion to Modify Trial Setting; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

**Mandate from MO Ct of Appeals**

Received and Filed. dismissed. So Ordered: Elizabeth B. Hogan, Judge

01/11/2024

**Ord Transfer P/Judge for Assn**

Cause assigned to Division # 10 for trial on 03/04/24. see court order So Ordered: Elizabeth B. Hogan, Judge

**Jury Trial Scheduled**

**Associated Entries: 01/17/2024 - Hearing/Trial Cancelled**

**Scheduled For:** 03/04/2024; 9:30 AM; REX M BURLISON; City of St. Louis

**Hearing/Trial Cancelled**

**Associated Entries: 01/02/2024 - Hearing Continued/Rescheduled**

**Associated Entries: 01/02/2024 - Jury Trial Scheduled**

**Scheduled For:** 03/04/2024; 9:00 AM; ELIZABETH BYRNE HOGAN; City of St. Louis

**Judge Assigned**

01/10/2024

Amended Notice of Hrng Filed

Plaintiffs Amended Notice of Hearing on Motion for a Trial Setting; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

01/09/2024

**Judge/Clerk - Note**

Mandate From Missouri Court of Appeals Eastern District received and filed

01/05/2024

Cert Serv Resp Req Prod Doc Th

Certificate of Service of Plaintiffs Responses and Objections to Defendants Discovery Requests; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

01/03/2024

Certificate of Service

Certificate of Service of Subpoena to Joseph Bartling; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN



**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

Motion for Trial Setting

MOTION FOR A TRIAL DATE; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

01/02/2024

**Jury Trial Scheduled**

**Associated Entries:** 01/11/2024 - Hearing/Trial Cancelled

**Scheduled For:** 03/04/2024; 9:00 AM; ELIZABETH BYRNE HOGAN; City of St. Louis

**Hearing Continued/Rescheduled**

**Associated Entries:** 11/17/2023 - Hearing Continued/Rescheduled

**Associated Entries:** 11/17/2023 - Jury Trial Scheduled

**Associated Entries:** 01/11/2024 - Hearing/Trial Cancelled

**Hearing Continued From:** 01/22/2024; 9:00 AM Jury Trial

12/21/2023

**Notice to Take Deposition**

Notice of Videotaped Deposition of Joseph Bartling; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Notice to Take Deposition**

Fifth Amended Notice of Videotaped Deposition of Jordan Conradson; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Notice to Take Deposition**

Fourth Amended Notice of Videotaped Deposition of Catherine McCulloch aka Kathleen OMalley; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

12/07/2023

**Notice to Take Deposition**

AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF FIREFLY ENGAGEMENT LLC; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

12/06/2023

Cert Serv Req Prod Docs Things

CERTIFICATE OF SERVICE; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

12/05/2023

Certificate of Service

Certificate of Service re Plaintiffs Subpoena Packet re Joseph Bartling; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Notice to Take Deposition**

Fourth Amended Notice of Videotaped Deposition of Jordan Conradson; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Notice to Take Deposition**

Third Amended Notice of Videotaped Deposition of Catherine McCulloch aka Kathleen OMalley; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

12/01/2023

**Notice to Take Deposition**

AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF FIREFLY ENGAGEMENT LLC; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

11/28/2023

Notice of Videotaped Deposition of Frances Watson; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

Notice

Notice of Videotaped Deposition of Paul Braun; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

11/27/2023

Consent Filed

Consent to Representation by Rule 13 Law Students; Electronic Filing Certificate of Service.

**Filed By:** TOBIN RAJU

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

11/26/2023

Notice

Defendants Notice of Availability; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

11/20/2023

Amended Notice of Hrng Filed

Amended Notice of Hearing on Plaintiffs Motion for a Scheduling Order; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

11/17/2023

**Jury Trial Scheduled**

**Associated Entries: 01/02/2024 - Hearing Continued/Rescheduled**

**Scheduled For:** 01/22/2024; 9:00 AM; ELIZABETH BYRNE HOGAN; City of St. Louis

**Hearing Continued/Rescheduled**

**Associated Entries: 09/13/2023 - Hearing Continued/Rescheduled**

**Associated Entries: 09/13/2023 - Jury Trial Scheduled**

**Associated Entries: 01/02/2024 - Hearing Continued/Rescheduled**

**Hearing Continued From:** 11/27/2023; 9:00 AM Jury Trial

11/14/2023

Notice of Hearing Filed

Notice of Hearing on Plaintiffs Motion to Amend the Scheduling Order; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

11/07/2023

**Order**

The Special Master, having filed his Third Report and Recommendation on November 3, 2023 and given the short time frames regarding the discovery, the Court hereby adopts the Third Report and Recommendation of the Special Master in its entirety. So Ordered: Judge Michael F. Stelzer

**Notice to Take Deposition**

Notice of Videotaped Deposition of Firefly Engagement LLC; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

11/01/2023

**Order**

Second Report and Recommendation of Special Master. So Ordered: Judge Michael F. Stelzer

10/31/2023

**Civil Motion Hearing Held**

**Associated Entries: 10/13/2023 - Civil Motion Hearing Scheduled**

**Scheduled For:** 10/30/2023; 9:00 AM; MICHAEL FRANCIS STELZER; City of St. Louis

10/30/2023

**Order**

IT IS HEREBY ORDERED that the Motion for Admission Pro Hac Vice of Charles F. Smith is GRANTED. So Ordered: Judge Michael F. Stelzer

**Order**

IT IS HEREBY ORDERED that the Motion for Admission Pro Hac Vice of Michael Morrell is GRANTED. So Ordered: Judge Michael F. Stelzer

**Order**

IT IS HEREBY ORDERED that the Motion for Admission Pro Hac Vice of Aanchal Chugh is GRANTED. So Ordered: Judge Michael F. Stelzer

**Order**

IT IS HEREBY ORDERED that the Motion for Admission Pro Hac Vice of Mary E. Grinman is GRANTED. So Ordered: Judge Michael F. Stelzer

**10/26/2023**

**Notice to Take Deposition**

Fourth Amended Notice of Videotaped Deposition of Cristina Laila; Electronic Filing Certificate of Service.

**Filed By:** JAMES FORREST BENNETT

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**10/20/2023**

**Notice to Take Deposition**

Second Amended Notice of Deposition of Catherine McCulloch aka Kathleen OMalley; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**10/13/2023**

**Civil Motion Hearing Scheduled**

**Associated Entries: 10/31/2023 - Civil Motion Hearing Held**

**Scheduled For:** 10/30/2023; 9:00 AM; MICHAEL FRANCIS STELZER; City of St. Louis

**10/12/2023**

Notice of Hearing Filed

Notice of Hearing on Plaintiffs Motion to Amend the Scheduling Order and Motions Regarding Depositions; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**10/11/2023**

**Notice to Take Deposition**

Amended Notice of Deposition of Catherine McCulloch; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Notice to Take Deposition**

Third Amended Notice of Deposition of Cristina Laila; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Notice to Take Deposition**

Third Amended Notice of Deposition of Jordan Conradson; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**10/02/2023**

**Notice to Take Deposition**

SECOND AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF ALICIA POWE a/k/a ALICIA JUBB; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

Motion Filed

Second Motion to Amend the Case Scheduling Order; Proposed Scheduling Order; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

Suggestions Filed

Suggestions in Support of Motion for Entry of a Protocol for Depositions; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

Suggestions Filed

Suggestions in Support of Motion for Leave to Take Additional Depositions; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

Motion for Leave

Motion for Leave to Take Additional Depositions; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

09/13/2023

**Jury Trial Scheduled**

**Associated Entries: 11/17/2023 - Hearing Continued/Rescheduled**

**Scheduled For:** 11/27/2023; 9:00 AM; ELIZABETH BYRNE HOGAN; City of St. Louis

**Hearing Continued/Rescheduled**

**Associated Entries: 08/02/2023 - Hearing Continued/Rescheduled**

**Associated Entries: 08/02/2023 - Jury Trial Scheduled**

**Associated Entries: 11/17/2023 - Hearing Continued/Rescheduled**

**Hearing Continued From:** 10/02/2023; 9:00 AM Jury Trial

09/12/2023

Notice

Amended Notice of Deposition of Alicia Powe; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

08/31/2023

**Notice to Take Deposition**

Second Amended Notice of Videotaped Deposition of Jordan Conradson; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Notice to Take Deposition**

Notice of Videotaped Deposition of Alicia Powe aka Alicia Jubb; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Notice to Take Deposition**

Second Amended Notice of Videotaped Deposition of Cristina Laila; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Notice to Take Deposition**

Notice of Videotaped Deposition of Catherine McColluch aka Kathleen OMalley; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

08/30/2023

**Order**

THEREFORE, it is ordered that Defendants' Motion to Stay is hereby DENIED. So Ordered: Judge Michael Stelzer #40716

08/22/2023

**Ackn Notice of Appeal Filed**

08/18/2023

**Hearing Held**

**Associated Entries: 08/15/2023 - Hearing Scheduled**

**Scheduled For:** 08/18/2023; 10:00 AM; MICHAEL FRANCIS STELZER; City of St. Louis

**Order**

The Special Master filed his Report and Recommendation on July 7, 2023. Defendants filed their objections on August 7, 2023. The Court scheduled and held a hearing on those objections on August 18, 2023 wherein all parties were represented and oral argument was held. After reviewing the plaintiffs' objections and the defendants' response thereto the Court hereby adopts pursuant to Rule 68.01(g)(3) the July 7, 2023 Report and Recommendation of the Special Master in its entirety except that Plaintiffs shall have 60 days instead of 30 days to respond to the documents in paragraph 7 on pages 12 and 13 of the July 7, 2023 Report and Recommendation of the Special Master. So Ordered: Judge Michael Stelzer #40716

**08/16/2023**

Response Filed

Plaintiffs Opposition to Defendants Motion to Stay Proceedings; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**08/15/2023**

**Hearing Scheduled**

**Associated Entries: 08/18/2023 - Hearing Held**

**Scheduled For:** 08/18/2023; 10:00 AM; MICHAEL FRANCIS STELZER; City of St. Louis

**Hearing/Trial Cancelled**

**Associated Entries: 08/10/2023 - Hearing Scheduled**

**Scheduled For:** 08/18/2023; 10:00 AM; ELIZABETH BYRNE HOGAN; City of St. Louis

**08/14/2023**

Entry of Appearance Filed

ENTRY OF APPEARANCE on behalf of Plaintiffs Ruby Freeman and Wandrea Moss; Electronic Filing Certificate of Service.

**Filed By:** TOBIN RAJU

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**08/10/2023**

**Order**

Defendant's Motion to Stay Case Pending Appeal is removed from the 8/14/23 Motion Docket and is set for 8/18/23 at 10:00 am  
SO ORDERED: JUDGE MICHAEL F. STELZER

**Hearing Scheduled**

**Associated Entries: 08/15/2023 - Hearing/Trial Cancelled**

**Scheduled For:** 08/18/2023; 10:00 AM; ELIZABETH BYRNE HOGAN; City of St. Louis

**Order**

This Court previously entered an Order on August 7, 2023 adopting the Report and Recommendation of the Special Master filed July 7, 2023. The Court noted in its August 7, 2023 Order that no objections had been filed to the Report and Recommendation of the Special Master. Since the entry of that Order the Court has been made aware that the Defendants filed Objections to the July 7, 2023 Report and Recommendation of the Special Master. These objections were e-filed at 10:14 p.m. on August 7, 2023. The Court vacates the August 7, 2023 Order and sets a hearing on the Report and Recommendation of the Special Master, These objections were e-filed at 10:14 p.m. on August 7, 2023. The Court vacates the August 7, 2023 Order and sets a hearing on the Report and Recommendations of the Special Master on Friday August 18, 2023 at 10:00 a.m. SO ORDERED: JUDGE MICHAEL F. STELZER

Judge/Clerk - Note

Notice of appeal sent to Missouri Court of Appeal@moappednoa@courts.mo.gov. Notice of appeal sent to James F. Bennett@jbennett@dowdbennett.com. Notice of appeal sent to Von A. DuBose@dubose@dubosemiller.com. Notice of appeal sent to Kurt G. Kastorf@kurt@kastorflaw.com. Notice of appeal sent to Brittany Williams@brittany.williams@protectdemocracy.org. Notice of appeal sent to Shalini Goel Agarwal@shalini.agarwal@protectdemocracy.org. Notice of appeal sent to John Langford@john.langford@protectdemocracy.org. Notice of appeal sent to David A. Schulz@david.schulz@yale.com

**08/09/2023**

**Notice to Take Deposition**

Amended Notice of Videotaped Deposition of Jordan Conradson; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Notice to Take Deposition**

Second Amended Notice of Videotaped Deposition of Patty McMurray; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**08/07/2023**

Objections Filed

Defendants Objections to the Report and Recommendation of the Special Master; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

08/02/2023

**Jury Trial Scheduled**

**Associated Entries: 09/13/2023 - Hearing Continued/Rescheduled**

**Scheduled For:** 10/02/2023; 9:00 AM; ELIZABETH BYRNE HOGAN; City of St. Louis

**Hearing Continued/Rescheduled**

**Associated Entries: 06/26/2023 - Hearing Continued/Rescheduled**

**Associated Entries: 06/26/2023 - Jury Trial Scheduled**

**Associated Entries: 09/13/2023 - Hearing Continued/Rescheduled**

**Hearing Continued From:** 08/07/2023; 9:00 AM Jury Trial

07/28/2023

**Appeal Costs Taxed**

07/27/2023

Notice of Hearing Filed

Defendants - Counterclaim Plaintiffs Notice of Hearing; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

Suggestions in Support

Defendants - Counterclaim Plaintiffs Suggestions in Support of their Motion for Stay Pending Appeal; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

Motion to Stay

Defendants - Counterclaim Plaintiffs Motion to Stay Pending Appeal; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

Notice of Appeal Filed

Defendants Counterclaim Plaintiffs Notice of Appeal; Exhibit A; Trial Court Order and Judgment; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

Motion of Withdrawl of Counsel

Motion for Withdrawal of Attorney Kelsey R. Eberly; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

07/24/2023

**Order**

ORDER AND JUDGMENT THEREFORE, it is ordered, and decreed as follows: Plaintiffs' Motion to Dismiss Defendants' Counterclaim is GRANTED. Defendants' Counterclaim is hereby dismissed. Plaintiffs' Motion to Strike Defendants' Anti-SLAPP Motion made under GA Code Section 9-11-11.1 is GRANTED. Defendants' Motion to Strike Under GA 9-11-11.1 is hereby stricken from the record. So Ordered: Judge Michael F. Stelzer

07/21/2023

**Notice to Take Deposition**

Amended Notice of Videotaped Deposition of Patty McMurray; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

07/20/2023

Reply

Plaintiffs Reply and Notice of Supplemental Authority in Support of Motion to Strike; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

07/13/2023

**Order**

Having considered Plaintiffs Motion for Admission Pro Hac Vice of Anna Dorman exhibits and any response thereto, the Court hereby grants Plaintiffs Motion for Admission Pro Hac Vice of Anna Dorman. SO ORDERED: JUDGE MICHAEL F. STELZER



Cause called and parties arguments heard in and begins Filings Motion to Dismiss Defendants Counterclaim and Plaintiffs Motion to Strike Defendants Goergia Anti-SLAPP Motion, Cause submitted SO ORDERED: JUDGE MICHAEL F. STELZER  
**Motion Hearing Held**

**Associated Entries: 05/16/2023 - Hearing Continued/Rescheduled**

**Associated Entries: 05/16/2023 - Civil Motion Hearing Scheduled**

**Scheduled For:** 07/13/2023; 2:00 PM; MICHAEL FRANCIS STELZER; City of St. Louis

**Motion Hearing Held**

**Associated Entries: 06/22/2023 - Motion Hearing Scheduled**

**Scheduled For:** 07/13/2023; 2:00 PM; MICHAEL FRANCIS STELZER; City of St. Louis

**07/11/2023**

Response Filed

Defendants Response in Opposition to Plaintiffs Motion to Strike Defendants Anti-SLAPP Motion; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

Response Filed

Defendants-Counterclaim Plaintiffs Response in Opposition to Plaintiffs-Counterclaim Defendants Motion to Dismiss Counterclaims; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

**07/07/2023**

Report Filed

Report and Recommendation of Special Master; Electronic Filing Certificate of Service.

**Filed By:** PETER JOSEPH DUNNE

**Proposed Order Filed**

Proposed Order; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

Motion Filed

Motion for Admission Pro Hac Vice of Anna Dorman; Exhibit A - Dorman Supreme Court Certification Receipt - 6302023; Exhibit B - Dorman DC Certificate of Good Standing; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**06/30/2023**

**Notice to Take Deposition**

Notice of Deposition of Patty McMurray; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**06/27/2023**

**Depositions Filed**

Amended Notice of Videotaped Deposition of Larry Johnson; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**06/26/2023**

**Notice to Take Deposition**

Amended Notice of Videotaped Deposition of Cristina Laila; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Jury Trial Scheduled**

**Associated Entries: 08/02/2023 - Hearing Continued/Rescheduled**

**Scheduled For:** 08/07/2023; 9:00 AM; ELIZABETH BYRNE HOGAN; City of St. Louis

**Hearing Continued/Rescheduled**

**Associated Entries: 04/27/2023 - Hearing Continued/Rescheduled**

**Associated Entries: 04/27/2023 - Jury Trial Scheduled**

**Associated Entries: 08/02/2023 - Hearing Continued/Rescheduled**

**Hearing Continued From:** 06/26/2023; 9:00 AM Jury Trial

**06/23/2023**



Filed By: MATTHEW DOMINIC AMPLEMAN

**Reply**

2023.06.23 Plfs Supplemental Filing for Discovery Motions; Ex. 1-2022.12.15-Hearing Transcript; Ex. 2-Provisionally Filed Under Seal; Ex. 3-Provisionally Filed Under Seal; Ex. 4-Provisionally Filed Under Seal; Ex. 5-2023.02.27-J. Hawk Ltr to M. Ampleman; Electronic Filing Certificate of Service.

Filed By: MATTHEW DOMINIC AMPLEMAN

**Motion for Leave**

Plfs Motion for Leave to File Exhibits Under Seal; Electronic Filing Certificate of Service.

Filed By: MATTHEW DOMINIC AMPLEMAN

On Behalf Of: RUBY FREEMAN, WANDREA MOSS

06/22/2023

**Motion Hearing Scheduled**

**Associated Entries: 07/13/2023 - Motion Hearing Held**

**Scheduled For:** 07/13/2023; 2:00 PM; MICHAEL FRANCIS STELZER; City of St. Louis

**Order**

It is hereby ORDERED that the following motions are scheduled for Thursday, July 13, 2023 at 2:00 pm: Plaintiffs Motion to Strike Defendants Anti SLAPP Motion for Summary Judgment, filed on May 5, 2023 Plaintiffs Motion to Dismiss Defendants Counterclaim, filed on March 23, 2023 SO ORDERED: JUDGE MICHAEL F. STELZER

06/16/2023

**Reply**

DEFENDANTS REPLY IN SUPPORT OF MOTION TO STAY DISCOVERY; Electronic Filing Certificate of Service.

Filed By: JONATHON CHRISTIAN BURNS

On Behalf Of: JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

**Response Filed**

DEFENDANTS OPPOSITION TO PLAINTIFFS THIRD MOTION TO COMPEL DISCOVERY; Electronic Filing Certificate of Service.

Filed By: JONATHON CHRISTIAN BURNS

On Behalf Of: JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

**Response Filed**

DEFENDANTS OPPOSITION TO PLAINTIFFS MOTION TO COMPEL COMPLIANCE WITH THE COURTS DISCOVERY ORDERS; Electronic Filing Certificate of Service.

Filed By: JONATHON CHRISTIAN BURNS

06/15/2023

**Proposed Order Filed**

Plaintiffs Revised Proposed Order Granting Discovery Motions; Electronic Filing Certificate of Service.

Filed By: MATTHEW DOMINIC AMPLEMAN

On Behalf Of: RUBY FREEMAN, WANDREA MOSS

**Notice**

Notice of Filing Proposed Order; Electronic Filing Certificate of Service.

Filed By: MATTHEW DOMINIC AMPLEMAN

**Response Filed**

Plaintiffs Opposition to Defendants Motion to Stay Discovery; Electronic Filing Certificate of Service.

Filed By: MATTHEW DOMINIC AMPLEMAN

On Behalf Of: RUBY FREEMAN, WANDREA MOSS

06/13/2023

**Notice to Take Deposition**

Notice of Videotaped Deposition of Larry Johnson; Electronic Filing Certificate of Service.

Filed By: MATTHEW DOMINIC AMPLEMAN

On Behalf Of: RUBY FREEMAN, WANDREA MOSS

**Notice to Take Deposition**

Notice of Videotaped Deposition of Jordan Conradson; Electronic Filing Certificate of Service.

Filed By: MATTHEW DOMINIC AMPLEMAN

On Behalf Of: RUBY FREEMAN, WANDREA MOSS

**Notice to Take Deposition**

Notice of Videotaped Deposition of Cristina Laila; Electronic Filing Certificate of Service.

Filed By: MATTHEW DOMINIC AMPLEMAN

On Behalf Of: RUBY FREEMAN, WANDREA MOSS

06/09/2023

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

06/07/2023

**Suggestions in Opposition**

Defendants Opposition to Plaintiffs Motion for Clarification; Exhibit 1; Exhibit 2; Exhibit 3; Exhibit 4; Exhibit 5; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

**Notice of Hearing Filed**

Defendants Notice of Hearing on Their Motion to Strike Pursuant to GA Code Sec 9-11-11,1 - pursuant to the Courts Order of May 16, 2023; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

**Other Proposed Document Filed**

Proposed Order Granting Plaintiffs Motion for Clarification; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Amended Notice of Hrng Filed**

Amended Notice of Hearing on Plaintiffs Motion for Clarification; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

05/30/2023

**Notice of Hearing Filed**

Notice of Hearing on Plaintiffs Motion for Clarification; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

05/26/2023

**Motion Filed**

Plaintiffs Motion for Clarification of the Courts May 16, 2023, Order; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

05/16/2023

**Civil Motion Hearing Scheduled**

**Associated Entries:** 07/13/2023 - Motion Hearing Held

**Scheduled For:** 07/13/2023; 2:00 PM; MICHAEL FRANCIS STELZER; City of St. Louis

**Hearing Continued/Rescheduled**

**Associated Entries:** 05/11/2023 - Civil Motion Hearing Scheduled

**Associated Entries:** 07/13/2023 - Motion Hearing Held

**Hearing Continued From:** 05/15/2023; 9:00 AM Civil Motion Hearing

**Order for Continuance**

The following motions are rescheduled for Thursday July 13, 2023 at 2pm: Defendant's Motion for Summary Judgment Plaintiff's Motion to Strike Defendant's Summary Judgment Motion and Motion to Dismiss the Counterclaim. So Ordered: Judge Michael Stelzer #40716

05/11/2023

**Civil Motion Hearing Scheduled**

**Associated Entries:** 05/16/2023 - Hearing Continued/Rescheduled

**Scheduled For:** 05/15/2023; 9:00 AM; MICHAEL FRANCIS STELZER; City of St. Louis

05/10/2023

**Filing:**

OATH OF SPECIAL MASTER

**Filed By:** PETER JOSEPH DUNNE

**Order**

ORDER APPOINTING MASTER: COMES NOW this Court under Rule 68.01 and hereby appoints Peter Dunne to be Special Master in this matter. Within 7 days of receipt of this order, the Master shall appear beofre the Honorable Michael F. Stelzer, Div. 6 of 22nd Judicial Circuit to have his oath administered pursuant to Rule 68.01(d). SEE ORDER FOR DETAILS. So Ordered: Judge Michael Stelzer #40716

05/09/2023

**Suggestions in Support**

Suggestions in Support of Defendants Motion to Stay and for Protective Order; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

**Notice of Hearing Filed**

Defendants Notice of Hearing; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**Motion to Stay**

Defendants Motion for Protective Order and to Stay Discovery; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

05/08/2023

**Amended Notice of Hrng Filed**

Plaintiffs 3rd Amended Notice of Hearing; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Certificate of Service**

Certificate of Attempt to Resolve Pursuant to Local Rule 33.5; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**Proposed Order Filed**

Proposed Order; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**Motion to Compel**

Plaintiffs 3rd Motion to Compel and Suggestions in Support; Exhibit 1; Exhibit 2; Exhibit 3; Exhibit 4; Exhibit 5; Exhibit 6; Exhibit 7; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

05/05/2023

**Amended Notice of Hrng Filed**

Second Amended Notice of Hearing; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Proposed Order Filed**

Proposed Scheduling Order; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**Motion Filed**

Motion to Amend Case Scheduling Order; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

05/01/2023

**Amended Notice of Hrng Filed**

Second Amended Notice of Hearing - May 15, 2023; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

04/27/2023

**Suggestions in Support**

Memo in Support of Defendants Motion to Unseal Memorandum in Support of Motion to Strike Under GA Code 9-11-11.1, and All Exhibits and Attachments Thereto; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

**Motion Filed**

Defendants Motion to Unseal Memorandum in Support of Motion to Strike Under GA Code 9-11-11.1, and All Exhibits and Attachments Thereto; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**Jury Trial Scheduled**

**Associated Entries: 06/26/2023 - Hearing Continued/Rescheduled**

**Scheduled For:** 06/26/2023; 9:00 AM; ELIZABETH BYRNE HOGAN; City of St. Louis

**Associated Entries: 03/15/2023 - Hearing Continued/Rescheduled**

**Associated Entries: 03/15/2023 - Jury Trial Scheduled**

**Associated Entries: 06/26/2023 - Hearing Continued/Rescheduled**

**Hearing Continued From:** 05/09/2023; 9:00 AM Jury Trial

**04/26/2023**

**Memorandum Filed**

MEMORANDUM IN SUPPORT OF MOTION TO STRIKE UNDER GA CODE § 9-11-11.1; Motion Authentication - Affidavit; Exhibit 1 - Miami Herald Pulitzer Win; Exhibit 2 - Gateway Pundit About Page; Exhibit 3 - Affidavit; Exhibit 4 - Affidavit; Exhibit 5 - Gateway Pundit Article - September 20 2021; Exhibit 6 - Gateway Pundit Article - September 21, 2021; Exhibit 7 - Testimony of Wandrea Shaye Moss; Exhibit 8 - Vanity Fair Article June 21 2022; Exhibit 9 - Reuters Report December 1, 2021; Exhibit 10 - The Navarro Report; Exhibit 11 - Atlanta Journal Article November 3, 2020; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

**Motion to Strike**

Defendants Motion to Strike Petition Pursuant to GA Anti-SLAPP Statute; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**04/25/2023**

**Stmnt Uncon/Mater Facts Filed**

Statement of Uncontroverted and Material Facts in Support of Motion for Summary Judgment; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

**Exhibit Filed**

Exhibit 18 - Miami Herald Article - September 8, 2014; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**Exhibit Filed**

Exhibit 17 - NBC News Article August 14, 2020; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**Exhibit Filed**

Exhibit 16 - Gateway Pundit Article September 23, 2020; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**Exhibit Filed**

Exhibit 15 - Gateway Pundit Twitter Feed December 7, 2020; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**Exhibit Filed**

Exhibit 14 - Forbes Article December 7, 2020; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

**Exhibit Filed**

Exhibit 13 - Washington Examiner Article December 7, 2020; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**Exhibit Filed**

Exhibit 12 - Politico Article November 3, 2020; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**Notice to Take Deposition**

Second Amended Notice of Videotaped Deposition of Yaacov Apfelbaum; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Notice to Take Deposition**

Second Amended Notice of Videotaped Deposition of XRVision Ltd.; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**04/24/2023**

**Proposed Order Filed**

Proposed Order regarding Plaintiffs Motion to Compel Compliance with The Courts Discovery Orders; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Suggestions in Support**

Case 4:24-cv-00900-PDU Document 95 Filed 10/15/24 Page 20 of 25 PageID #: 386  
Suggestions in Support of Plaintiffs Motion to Compel Compliance with The Courts Discovery Orders; Exhibit 1; Exhibit 2; Exhibit 3; Exhibit 4; Exhibit 5; Exhibit 6; Exhibit 7; Exhibit 8; Exhibit 9; Exhibit 10; Exhibit 11; Exhibit 12; Exhibit 13; Exhibit 14; Certificate of Attempt to Resolve Pursuant to Local Rule 33.5; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**Motion to Compel**

Plaintiffs Motion to Compel Compliance with The Courts Discovery Orders; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**04/17/2023**

**Hearing/Trial Cancelled**

**Associated Entries:** 04/12/2023 - Civil Motion Hearing Scheduled

**Scheduled For:** 04/17/2023; 9:00 AM; MICHAEL FRANCIS STELZER; City of St. Louis

**04/12/2023**

**Civil Motion Hearing Scheduled**

**Associated Entries:** 04/17/2023 - Hearing/Trial Cancelled

**Scheduled For:** 04/17/2023; 9:00 AM; MICHAEL FRANCIS STELZER; City of St. Louis

**04/05/2023**

**Notice to Take Deposition**

Amended Notice of Videotaped Deposition of Yaacov Apelbaum; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Notice to Take Deposition**

Amended Notice of Videotaped Deposition of XRVision, Ltd.; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**Amended Notice of Hrng Filed**

Amended Notice of Hearing - Plaintiffs Motion to Dismiss Counterclaims; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**04/04/2023**

**Subpoena Served**

Notice of Return of Service - Subpoena on Y. Apelbaum; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Subpoena Served**

Notice of Return of Service - Subpoena on XRVision, Ltd.; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**Notice to Take Deposition**

NOTICE OF VIDEOTAPED DEPOSITION OF XRVISION, LTD.; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**Notice to Take Deposition**

NOTICE OF VIDEOTAPED DEPOSITION OF YAACOV APELBAUM; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**04/03/2023**

**Notice of Hearing Filed**

Notice of Hearing - Plaintiffs Motion to Dismiss Counterclaims; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**03/23/2023**

**Memorandum Filed**

MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION TO DISMISS DEFENDANTS' COUNTERCLAIM PURSUANT TO RULE 55.27(a)(11), AND RULE 55.27(a)(6). ; Exhibit A; Exhibit B; Electronic Filing Certificate of Service.

**Filed By:** JAMES FORREST BENNETT

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Motion to Dismiss**

Plaintiffs Motion to Dismiss Defendants Improper Counterclaim Pursuant to Rule 55.27a11 and Rule 55.27a6; Electronic Filing Certificate of Service.

**Filed By:** JAMES FORREST BENNETT

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**03/15/2023**

**Associated Entries: 04/27/2023 - Hearing Continued/Rescheduled**

**Scheduled For:** 05/09/2023; 9:00 AM; ELIZABETH BYRNE HOGAN; City of St. Louis

**Hearing Continued/Rescheduled**

**Associated Entries: 02/01/2023 - Hearing Continued/Rescheduled**

**Associated Entries: 02/01/2023 - Jury Trial Scheduled**

**Associated Entries: 04/27/2023 - Hearing Continued/Rescheduled**

**Hearing Continued From:** 03/20/2023; 9:00 AM Jury Trial

**02/13/2023**

**Certificate of Service**

Certificate of Service of Plaintiffs Second Interrogatories; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**02/03/2023**

**Cert Serv Req Prod Docs Things**

Certificate of Service - Plaintiffs Third RFPs to Defendants; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**02/01/2023**

**Order Granting Ext of Time**

PLAINTIFFS CONSENT MOTION FOR EXTENSION OF TIME TO FILE A RESPONSIVE PLEADING TO DEFENDANT'S COUNTERCLAIM GRANTED SO ORDERED: JUDGE ELIZABETH B HOGAN

**Jury Trial Scheduled**

**Associated Entries: 03/15/2023 - Hearing Continued/Rescheduled**

**Scheduled For:** 03/20/2023; 9:00 AM; ELIZABETH BYRNE HOGAN; City of St. Louis

**Hearing Continued/Rescheduled**

**Associated Entries: 12/07/2022 - Hearing Continued/Rescheduled**

**Associated Entries: 12/07/2022 - Jury Trial Scheduled**

**Associated Entries: 03/15/2023 - Hearing Continued/Rescheduled**

**Hearing Continued From:** 02/06/2023; 9:00 AM Jury Trial

**01/30/2023**

**Proposed Order Filed**

Proposed Order Granting Motion for Extension of Time; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Motion for Extension of Time**

Consent Motion for Extension of Time to File Responsive Pleading; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**01/16/2023**

**Answer Filed**

Defendants Answer and Affirmative Defenses to Plaintiffs Second Amended Petition and Counterclaims; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

**01/10/2023**

**Exhibit Filed**

Exhibits 31 to 35 to Second Amended Petition; Exhibits 36 to 40 to Second Amended Petition; Exhibits 41 to 45 to Second Amended Petition; Exhibits 46 to 50 to Second Amended Petition; Exhibit 51 to 55 to Second Amended Petition; Exhibits 56 to 61 to Second Amended Petition; Electronic Filing Certificate of Service.

**Filed By:** JAMES FORREST BENNETT

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Other Proposed Document Filed**

Second Amended Petition; Exhibits 1 to 5 to Second Amended Petition; Exhibits 6 to 10 to Second Amended Petition; Exhibits 11 to 15 to Second Amended Petition; Exhibits 16 to 20 to Second Amended Petition; Exhibits 21 to 25 to Second Amended Petition; Exhibits 26 to 30 to Second Amended Petition; Electronic Filing Certificate of Service.

**Filed By:** JAMES FORREST BENNETT

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**12/20/2022**



**Order for Trial Setting**

Order requesting the court to adopt the following joint proposed scheduling order. (See order for details) SO ORDERED JUDGE JASON M. SENGHEISER

**Order**

Plaintiffs' second motion to compel discovery and for a protective order and Defendants' Cross Motion for Protective Order. The Court now rules as follows. THEREFORE, it is Ordered and Decreed that Plaintiffs' Second Motion to Compel Discovery and for a Protective Order is hereby GRANTED. Defendants are Ordered to answer the subject discovery within twenty days of date of this Order. This court will enter Plaintiffs' proposed Protective Order. In all other respects, Plaintiffs' motion is denied. Defendants' Cross Motion for Protective Order is granted in part to extent that this Court is entering a Protective Order in order to protect the confidential information of the parties. Defendants' Cross Motion for Protective Order is denied in all other respects. SO ORDERED JUDGE JASON M. SENGHEISER.

**Order**

Plaintiffs' Motion to Compel Production of Documents and Interrogatories is hereby GRANTED IN PART. Defendant shall determine a set of keywords to search their database of documents, shall prepare a privilege log regarding the materials it claims are privileged, and to enable Plaintiffs to assess the applicability of the claimed privilege. Defendants objections that discovery is vague, overbroad, etc (see order for more details) are HEREBY OVERRULED. Defendants are Ordered to answer the subject discovery within twenty days of the date of this Order. The parties are ordered to meet and confer in good faith in order to execute a stipulated ESI protocol. In all other respects, Plaintiffs' motion is denied. SO ORDERED JUDGE JASON M. SENGHEISER.

**Order**

PROTECTIVE ORDER (see order for details) SO ORDERED JUDGE JASON M. SENGHEISER.

12/15/2022

**Hearing Held**

**Associated Entries: 12/08/2022 - Civil Motion Hearing Scheduled**

**Scheduled For:** 12/15/2022; 1:30 PM; JASON MARK SENGHEISER; Carnahan Courthouse

12/14/2022

**Reply**

Plaintiffs Reply in Support of Their Second Motion to Compel and Opposition to Defendants Cross-Motion for a Protective Order; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

12/13/2022

**Response Filed**

Defendants Response in Opposition to Plaintiffs Second Motion to Compel Discovery and for Protective Order and Defendants Cross Motion for Protective Order; Exhibit A - Proposed Protective Order; Exhibit B - Protective Order - Red Lined; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

12/08/2022

**Civil Motion Hearing Scheduled**

**Associated Entries: 12/15/2022 - Hearing Held**

**Scheduled For:** 12/15/2022; 1:30 PM; JASON MARK SENGHEISER; Carnahan Courthouse

12/07/2022

**Notice of Hearing Filed**

Notice of Hearing - Plaintiffs Second Motion to Compel; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Jury Trial Scheduled**

**Associated Entries: 02/01/2023 - Hearing Continued/Rescheduled**

**Scheduled For:** 02/06/2023; 9:00 AM; ELIZABETH BYRNE HOGAN; City of St. Louis

**Hearing Continued/Rescheduled**

**Associated Entries: 07/07/2022 - Jury Trial Scheduled**

**Associated Entries: 02/01/2023 - Hearing Continued/Rescheduled**

**Hearing Continued From:** 12/12/2022; 9:00 AM Jury Trial

12/06/2022



**Certificate of Service**

Defendants James and Joseph Hofts Certificate of Service First Supplemental Discovery Responses  
Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

**Entry of Appearance Filed**

Entry of Appearance for E. Dowd; Electronic Filing Certificate of Service.

**Filed By:** EDWARD L DOWD JR

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Reply**

Plaintiffs Reply in Support of Their First Motion to Compel Discovery; Exhibit 1; Exhibit 2; Exhibit 3; Exhibit 4; Exhibit 5; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**12/05/2022**

**Response Filed**

Defendants Response In Opposition to Plaintiffs First Motion to Compel Production of Documents and Answers to Interrogatories; Exhibit 1; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

**12/02/2022**

**Amended Notice of Hrng Filed**

Second Amended Notice of Hearing; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Proposed Order Filed**

Proposed Protective Order; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**Proposed Order Filed**

Proposed Order regarding Motion to Amend and both Motions to Compel; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**Motion to Compel**

Plaintiffs Second Motion to Compel Discovery and for a Protective Order and Suggestions in Support; Exhibit 1; Exhibit 2; Exhibit 3; Exhibit 4; Exhibit 5; Exhibit 6; Exhibit 7; Exhibit 8; Exhibit 9; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**11/18/2022**

**Proposed Order Filed**

Proposed Scheduling Order; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Motion Filed**

Joint Motion for Proposed Scheduling Order; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**11/17/2022**

**Proposed Order Filed**

[PROPOSED] ORDER; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Motion Filed**

MOTION FOR ADMISSION PRO HAC VICE; Exhibit A; Exhibit B; Entry of Appearance for K. Eberly; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**11/16/2022**

**Certificate of Service**

Defendants Certificate of Service of First Objections to Plaintiffs Second Requests for Production Nos 1-14; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

**11/14/2022**

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

11/11/2022

**Proposed Order Filed**

[PROPOSED] ORDER ; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Motion to Compel**

PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF DOCUMENTS AND ANSWERS TO INTERROGATORIES AND SUGGESTIONS IN SUPPORT ; Ex. 1; Ex. 2; Ex. 3; Ex. 4; Ex. 5; Ex. 6; Ex. 7; Ex. 8; Ex. 9; Ex. 10; Ex. 11; Ex. 12; Ex. 13; Ex. 14; Ex. 15; Ex. 16; Ex. 17; Ex. 18; Ex. 19; Ex. 20; Ex. 21; Ex. 22; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

10/28/2022

**Motion Filed**

Motion for Admission Pro Hac Vice; Exhibit A; Exhibit B; Proposed Order; Entry of Appearance; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

10/17/2022

**Cert Serv Req Prod Docs Things**

Certificate of Service - 2nd Requests for Production to Defendants; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Notice of Hearing Filed**

Notice of Hearing - December 7, 2022; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

09/22/2022

**Notice to Take Deposition**

Notice of Videotaped Deposition of Defendant Joseph Hoft; Electronic Filing Certificate of Service.

**Filed By:** JAMES FORREST BENNETT

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

08/30/2022

**Notice of Hearing Filed**

Notice of Hearing; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

08/25/2022

**Proposed Order Filed**

Proposed Order Regarding Motion for Leave to Amend; Electronic Filing Certificate of Service.

**Filed By:** JAMES FORREST BENNETT

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Suggestions in Support**

Plaintiffs Suggestions in Support of Their Motion for Leave to Amend Petition; Exhibit A; Electronic Filing Certificate of Service.

**Filed By:** JAMES FORREST BENNETT

**Motion for Leave**

Plaintiffs Motion for Leave to Amend Petition; Exhibit A; Electronic Filing Certificate of Service.

**Filed By:** JAMES FORREST BENNETT

08/12/2022

**Certificate of Service**

Defendants Certificate of Service of First Answers to Plaintiffs First Interrogatories, Nos 1-23 , dated August 12, 2022; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

**On Behalf Of:** JAMES HOFT, JOSEPH HOFT, TGP COMMUNICATIONS LLC

**Certificate of Service**

Defendants Certificate of Service of First Objections to Plaintiffs First Interrogatories and First Requests for Production, dated July 12, 2022; Electronic Filing Certificate of Service.

**Filed By:** JONATHON CHRISTIAN BURNS

07/15/2022

**Motion Filed**

Motion for Admission Pro Hac Vice; Ex. A - Receipt; Certificate of Good Standing; Proposed Order; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

07/13/2022

**Proposed Order Filed**

Proposed Order; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Motion Filed**

Motion for Admission Pro Hac Vice; Ex. A - Receipt; Certificate of Good Standing; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**Proposed Order Filed**

Proposed Order; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Motion Filed**

Motion for Admission Pro Hac Vice; Ex. A - Receipt; Certificate of Good Standing; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**Proposed Order Filed**

Proposed Order; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

**On Behalf Of:** RUBY FREEMAN, WANDREA MOSS

**Motion Filed**

Motion for Admission Pro Hac Vice; Ex. A - Receipt; Certificate of Good Standing; Electronic Filing Certificate of Service.

**Filed By:** MATTHEW DOMINIC AMPLEMAN

07/07/2022

**Jury Trial Scheduled**

**Associated Entries: 12/07/2022 - Hearing Continued/Rescheduled**

**Scheduled For:** 12/12/2022; 9:00 AM; MICHAEL FRANCIS STELZER; City of St. Louis

06/14/2022

**Reopen From Mandate**